

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)

Closed Captioning and Video)
Description of Video Programming)

Implementation of Section 305 of the)
Telecommunications Act of 1996)

Video Programming Accessibility)

MM Docket No. 95-176

COMMENTS OF FOX SPORTS NET, LLC

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February 28, 1997

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SUMMARY

Both the Congress and the Commission have recognized that “classes of programming” should be exempted from mandatory closed captioning “where the economic burden of captioning these programming types outweighs the benefits to be derived from captioning and, in some cases, the complexity of adding the captions.” In defining and quantifying such “economic burden,” the Commission suggests that “factors such as relative market size, degree of distribution, audience ratings or share, relative programming budgets or revenue base, lack of repeat value, or a combination of factors” may support such exemption.

Fox Sports Net respectfully submits that, as set forth below, regional sports programming services clearly meet the criteria for a categorical exemption from closed captioning requirements -- particularly in view of the increasingly widespread use of supplemental graphics by regional sports networks. The high cost of closed captioning live events, the limited existing capacity for such closed captioning, the inability to spread closed captioning costs among large numbers of subscribers or across multiple showings of a sporting event, and the visual nature of sporting events as supplemented by graphics demonstrate that closed captioning regional sports network programming would be economically burdensome.

The number of subscribers to a regional sports network is limited by definition to a specific geographic area for which the local team or conference has distribution rights. Moreover, professional events may be licensed only for a portion of a network’s territory, and, within that territory, the distribution available to a regional sports network is limited to subscription television which rarely achieves a penetration in excess of 66 percent. A regional sports network also may not be carried by all MVPDs in a territory or provided to all customers served by each distributor. Because of these distribution limitations, the ratings available to

regional sports programming are limited, and the cost of closed captioning per viewing household is prohibitive.

Live sports programming must be closed captioned in "real time," which poses higher costs and more difficult logistical problems. Based upon the Commission's cost estimates, the closed captioning of regional sports events would increase production costs by roughly ten percent. Because of the hundreds of events televised by regional networks in addition to their other programming, such costs would be excessive and pressure regional networks to produce substantially fewer local live events. The net result would be decreasing localism and diversity. Finally, there is no "residual" market for sports programming so that closed captioning costs cannot be spread over multiple showings.

In addition to its high cost, closed captioning sports programming requires specialized steno-captioning skills which are in short supply. If the Commission's estimates of real time captioning capacity are reasonably accurate, a fraction of the games produced by regional sports networks would swamp existing capacity. Further, the utilization and coordination of the existing closed captioning resources would pose a variety of technical and logistical problems previously recognized by the Commission. Finally, because of the visual nature of sports programming, much of the information that would be otherwise unavailable to the hearing impaired viewer may be communicated through the increasingly widespread use of graphics.

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COMMENTS OF FOX SPORTS NET, LLC

Fox Sports Net, LLC submits these comments in response to the Commission's Notice of Proposed Rulemaking in this proceeding to implement Section 305 of the Telecommunications Act of 1996. Fox Sports Net recognizes the importance of serving the hearing impaired and responds to the Commission's request for comment on the difficult balance between providing access to Americans with disabilities through closed captioning and the costs and burdens imposed by mandatory captioning. Notice at ¶70.

Fox Sports Net manages and/or has ownership interests in a number of regional sports networks which develop, produce, syndicate and distribute through multichannel video programming distributors ("MVPDs") sports programming of largely local and regional interest,

as well as certain sports programming of national interest. The regional sports networks managed by Fox Sports Net, including the territory and number of subscribers served by each, are identified in the annexed Exhibit A. Because of its extensive experience with regional sports programming networks, Fox Sports Net believes that it is well positioned to provide information regarding the unique problems posed by the closed captioning of sports programming for regional sports networks.

I. Programming Services May Be Exempted From Mandatory Closed Captioning Where Captioning Would Be "Economically Burdensome."

Both the Commission and Congress have recognized that, notwithstanding the public interest benefits of closed captioning, mandatory closed captioning is not feasible for all programming and all programming providers. Consequently, Congress authorized the Commission to exempt "programs, classes of programs, or services" for which mandatory closed captioning would be "economically burdensome."¹ See 47 U.S.C. §613(d)(1). The House Report identified "locally produced or regionally distributed" programming as an example of programming for which captioning may be "economically burdensome." H.R. Rep. No. 204, 104th Cong., 1st Sess. 114 (1995).

¹ The Conference Committee identified the following factors from the House Report for the Commission to consider in establishing such exemptions: (1) nature and cost of providing closed captions; (2) impact on the operations of the program provider, distributor, or owner; (3) financial resources of the program provider, distributor, or owner and the financial impact of the program; (4) cost of the captioning, considering the relative size of the market served or the audience share; (5) cost of the captioning, considering whether the program is locally or regionally produced and distributed; (6) non-profit status of the provider; and (7) existence of alternative means of providing access to the hearing impaired. H.R. Conf. Rep. No. 458, 104th Cong., 2d Sess. 183 (1996).

The Commission interprets the statutory exemption from mandatory closed captioning for “economic burden” as permitting it to “exempt those classes of programming where the economic burden of captioning these programming types outweighs the benefits to be derived from captioning and, in some cases, the complexity of adding the captions.” Notice at ¶70. In defining and quantifying such “economic burden,” the Commission suggests that “factors such as relative market size, degree of distribution, audience ratings or share, relative programming budgets or revenue base, lack of repeat value, or a combination of factors” may be determinative. Id. at ¶71. In balancing the economic burden of closed captioning with its benefit, the Commission also solicits comment on whether there are less burdensome alternatives, such as the “presentation of basic information in textual or graphical form.” Id. at ¶84.

II. Regional Sports Networks Satisfy Each Of The Criteria Identified By The Commission For Determining That Captioning Would Be Economically Burdensome.

Based upon the data submitted in its Notice of Inquiry proceeding, the Commission noted that regional programming, whether primarily news or sports, is “generally not captioned.” Notice at ¶17. Because of the high cost of closed captioning live events, the limited existing capacity for such closed captioning, the inability to spread closed captioning costs among large numbers of subscribers or across multiple showings of a sporting event, and the visual nature of sporting events as supplemented by widespread graphics, all broadcast commenters requested the Commission to exempt regional sports broadcasts from mandatory closed captioning requirements. Id. at ¶66; Comments of CBS, Inc. (“CBS”) at 31; Comments

of Capital Cities/ABC, Inc. ("ABC") at 13-14; Comments of National Broadcasting Company, Inc. ("NBC") at 13-14; Comments of the National Association of Broadcasters ("NAB") at 10-11; Comments of the Satellite Broadcasting and Communications Association ("SBCA") at 9. Fox Sports Net respectfully submits that, as set forth below, regional sports programming services clearly meet the criteria for a categorical exemption from closed captioning requirements -- particularly in view of the increasingly widespread use of supplemental graphics by regional sports networks.

A. Relative Market Size And Degree Of Distribution

The legislative history of Section 305 of the 1996 Telecommunications Act makes clear that Congress considered the benefits and burdens of closed captioning in the context of programming distributed nationally through multiple showings and media. In contrast, regional sports programming services cannot achieve similar economies and efficiencies because their right to distribute sports programming is limited to particular geographic areas with fewer potential viewers and, as a practical matter, a single live showing of the sporting event with only very limited replay opportunities.

Typically, a regional sports network is licensed to provide its primary sports programming to a specific geographic area for which the local team or conference has distribution rights. Fox Sports Net provides in Exhibit A the rough parameters of the regions for the networks it manages. In addition, for the larger regional sports networks, professional events may only be licensed for a portion of the network's territory. For example, Fox Sports Southwest produces and distributes games of the Houston Rockets, Dallas Mavericks, and San Antonio Spurs NBA teams. However, it is licensed to distribute the games for each of those

teams to only a portion of its overall territory surrounding each team's home arena.² Within that territory, the distribution available to a regional sports network also is limited to subscription television which rarely achieves a penetration in excess of 66 percent. Further, the regional sports network is not necessarily carried by all multichannel video programming distributors within a territory or provided to all subscribers served by each distributor.

Consequently, the number of available subscribers to a regional sports network is limited by definition. Again, as summarized in Exhibit A, the regional sports networks managed by Fox Sports Net have between 740,000 and 5.2 million subscribers, which Fox Sports Net believes is representative of the typical regional sports network. However, even the gross number of subscribers for a network may overstate drastically the potential number of households to which a particular game may be distributed because of territorial licensing limitations. Thus, in contrast to the national broadcast networks or well-established basic cable networks, a regional network has far fewer subscribers to bear the costs of closed-captioning.³

B. Audience Share

Both the Commission and Congress recognized that the "relative size" of the "audience share" is a relevant factor when determining whether closed captioning would be "economically burdensome." See Notice at ¶71; H.R. Conf. Rep. No. 458, 104th Cong. 2d Sess.

² Thus, the same regional sports network may be distributing multiple events to different licensed territories within that region. Such simultaneous event programming would exacerbate the burden of mandatory closed captioning.

³ For example, as noted by ABC in the Notice of Inquiry proceeding, viewership of fractionalized regional audiences is not sufficient to support the cost of closed captioning, which remains substantially the same regardless of the audience size. ABC Comments at 6. For example, ABC addresses the circumstance where its national audience might be segmented into 14 regions -- each of which is larger than the region covered by a typical regional sports service.

183 (1996). Of course, the audience attracted by programming depends upon a number of variables including the quality and popularity of the programming, the number and type of distribution outlets, competing programming, and day and time of day aired. However, for regional sports networks, the most frequently viewed programming typically is men's professional baseball, basketball and hockey. Using Fox Sports Southwest as a sample market, the ratings of particular games will vary widely depending upon the sport. For example, an NBA game between the San Antonio Spurs and Golden State Warriors televised on November 17, 1996 drew a rating of 2.4 in San Antonio, but the game was unavailable in Dallas and Houston because of licensing restrictions. There are 641,740 television households in the San Antonio DMA with cable penetration of approximately 65 percent such that a 2.4 rating yields roughly 10,000 viewing households.⁴ A hockey game between the Dallas Stars and the Anaheim Mighty Ducks televised on November 15 drew a .7 rating while an NBA game between the Minnesota Timberwolves and the Dallas Mavericks on November 14 drew a 2.2 rating. Based upon cable penetration of 52 percent of the 1,848,550 television households in the Dallas DMA, these ratings yield 6,700 and 21,000 viewing households. For the Houston DMA, a November 16 game between the Golden State Warriors and Houston Rockets drew a 5.6 rating while an International Hockey League game between the Kansas City Blades and Houston Aeros televised on November 13 drew a .1 rating. With 1,595,350 television households in the Houston DMA and a cable penetration of 56 percent, these ratings yield 50,000 and less than

⁴ Fox Sports Net recognizes that this methodology provides only a rough estimate of the number of viewing households. To the extent that MVPDs other than cable distribute a regional sports network, the percentage of cable penetration would understate viewing households. However, this approach also presumes that the regional network is carried by all cable systems in a market and provided to all subscribers by each system, which presently would more than offset the failure to include distribution by alternative media.

1,000 viewing households respectively. Although there are exceptions depending upon the sport, event and market, the ratings generated by college and high school events, particularly sports other than Division I men's college football and basketball, generate significantly lower ratings.⁵

Thus, even if the cost of real-time captioning were lower than the \$660 median of the Commission's estimated cost (Notice at ¶20), such cost would be prohibitive for even the most popular sporting events regularly distributed by regional sports networks. At 2 to 3 hours per event, the cost would range from more than \$0.026 to nearly \$2.00 per viewing household.⁶ In contrast, even a lower-rated event on national network television will be viewed in hundreds of thousands of homes, reducing the cost of captioning to a fraction of a penny per viewing household. The mandatory closed captioning of hundreds of regional sports events annually for each regional network would pressure those networks to eliminate the less popular, professional and non-professional local events and substantially increase the production costs of the remaining events.

Such pressure would run directly contrary to the important contributions of regional sports networks to programming diversity and local origination. After an exhaustive

⁵ Typically, the territory for which such sporting events are licensed is not as narrowly limited as professional baseball, basketball and hockey games. However, such broader distribution throughout a regional sports network rarely offsets the significantly lower ratings when calculating total viewing households. Although multiple regional networks may share secondary backdrop programming, such as rugby, soccer and volleyball games, sports news, coaches' shows, anthologies, and similar programming, the audience shares of such programming are quite low.

⁶ The per viewing household costs are estimated as follows: 50,000 households viewed the Houston Rockets game at a captioning cost of \$1,320 (2 hours x \$660 per hour) or \$0.0264 per viewing household for closed captioning; and 1,000 households viewed the Houston Aeros game at a captioning cost of \$1,980 (3 hours x \$660 per hour) or \$1.98 per viewing household.

review of televised sports programming, the Commission found that regional sports networks “provide coverage of a wide variety of previously untelevised professional and amateur sporting events.” Inquiry into Sports Programming Migration, Final Report, 9 FCC Rcd. 3440 (1994), at ¶87. The Commission concluded that regional sports networks “serve the public interest objective of local origination” by providing televised coverage “for the first time to teams from local colleges and high schools, or to other events, such as the Special Olympics.” Id. at ¶88. Regional networks also have substantially increased the number of MLB, NBA and NHL games televised for local teams, as well as other professional sports such as soccer. Consequently, the growth of regional sports programming “appears to indicate an increase in viewer choice...and should therefore be considered to be in the public interest.” Id. at ¶92. The Commission should not stifle the continuing efforts of regional sports networks to provide diverse local programming by imposing mandatory captioning requirements which would be cost prohibitive.

C. Relative Programming Budgets

Live sports programming must be closed captioned in “real time,” which poses higher costs and more difficult logistical problems. The Commission provides a wide range of estimates for the “cost of real time captioning for live programming” from \$120 to \$1,200 an hour, presumably with corresponding differences in reliability and quality. Notice at ¶20. Consequently, the cost of closed captioning would increase the production costs for regional sporting events, which are typically approximately \$15,000 to \$25,000 for professional events and lesser amounts for collegiate and local events, by amounts approaching 10 percent of the full production budgets. Such closed captioning costs would not be cost effective because

captioning would convey little substantive information that regional sports networks do not communicate through their expanded use of graphic displays available to all viewers.

The cumulative burden of these closed captioning costs would be excessive for regional sports networks. As noted in Exhibit A, Fox Sports Southwest is one of the larger regional networks in terms of the number of subscribers. During 1997 Fox Sports Southwest expects to produce at least 727 live events. Of that total, 248 events are professional baseball, basketball and hockey games while 479 events include professional soccer, college, high school, and miscellaneous events with 62 live high school events scheduled for distribution. The mid-sized Fox Sports Northwest regional network is scheduled to produce 465 live events, including 173 professional baseball and basketball games, 77 pre-game shows and 215 other events. Thus, in addition to their other programming, Fox Sports Southwest is producing on average two live events daily and Fox Sports Northwest more than one live event per day. Although some other regional sports networks may produce substantially fewer live events, typically they have fewer subscribers over which to spread the costs of such events.

D. Lack Of Repeat Value

With rare exceptions, there is no “residual” market for sports programming. “Unlike feature films which have continuous audience appeal, sports events have substantial entertainment value only at the time of their occurrence.” Regulations Pertaining to the Showing of Sports Events on Over-the-Air Subscription Television or by Cablecasting, 52 F.C.C.2d 1, 57 (1974), on recon., 54 F.C.C.2d 797 (1975), set aside on other grounds sub nom. Home Box Office, Inc. v. FCC., 567 F.2d 9 (D.C. Cir. 1977), cert. denied, 434 U.S. 829 (1977). In short, the license fees for and production costs (including closed captioning costs) of programming

cannot be spread over multiple showings. See Comments of National Cable Television Association in Notice of Inquiry proceeding at 11 (“the cost of captioning cannot be recouped through subsequent airings of certain live programs (such as sports...)”).

III. The Unique Technical And Logistical Problems Faced By Regional Sports Networks And the Widespread Use Of Graphics As An Alternative Further Support An Exemption From Mandatory Captioning.

In addition to evaluating the economic burden of mandatory captioning, the Commission recognized that it should also consider the “complexity of adding captions” and the availability of other less burdensome alternatives such as the “presentation of basic information in textual or graphical form.” Notice at ¶¶70, 84. Such technical issues increase the burden and expense of mandatory captioning for regional sports networks while the presence of alternative means of communicating the information diminishes its benefit.

A. Complexity of Adding Captions

In addition to its high cost, the closed captioning of sports programming requires specialized steno-captioning skills⁷ which are in short supply. Indeed, estimates of qualified real-time captioners nationwide range from 83 to roughly 500. Notice at ¶24. In the Notice of Inquiry proceeding, network commenters concluded that there is “insufficient live-captioning capacity now to closed-caption the entire weekend regionalized sports schedules on the national broadcast networks.” ABC Comments at 6 n.9; see CBS Comments at 19; NBC Comments at 10-11. The availability of steno-captioning also varies from region to region so that “captioning

⁷ As explained by the Commission, steno-captioners “are trained as court reporters.” However, they also “require additional training to obtain the skills needed to report the verbatim speech, use correct spelling, syntax and grammar, and understand what is said.” Notice at ¶20 n.64.

services often do not exist in the regions where particular games” are produced, and encoding equipment may be unavailable at production sites. NBC Comments at 14. Likewise, there are significant disparities in the quality of service provided by local captioning services. ABC Comments at 10; CBS Comments at 19 (steno-captioning is “simply not available in many parts of the country”).

If these estimates are realistic, a fraction of the games produced by regional sports networks would swamp existing capacity. There are more than twenty regional sports networks located throughout the United States.⁸ Professional and college games of interest produced and televised by a regional sports network are often also produced and broadcast by over-the-air television in the away team’s market with a separate audio feed -- further increasing the number of games to be captioned. The mandatory closed captioning of the live sports programming on these networks would only exacerbate such shortages of skilled real-time captioners.

Further, the utilization and coordination of the existing closed captioning resources would pose a variety of technical and logistical problems, including the following “technical issues” acknowledged by the Commission:

[T]echnical or logistical problems with delivering different games to affiliates in various parts of the country at the same time; lack of stenocaptioning services in regions where particular games will be televised, making it impossible for the captioner to see the game and caption it in real-time; and lack of encoding equipment at the site from which the local programming is transmitted by uplink.

⁸ In addition to the regional sports networks which Fox Sports Net manages or in which it has an ownership interest as identified in Exhibit A, there are at least the following regional sports networks: Empire Sports Network; Madison Square Garden Network; Midwest Sports Channel; New England Sports Network; PASS Sports; Sports Channel Florida; Sports Channel New England; Sports Channel New York; and Sports Channel Ohio.

Notice at ¶66. The fact that CBS could provide real-time captioning for the NCAA Men's Basketball Championships, which is among the most popular nationally televised sporting events, does not suggest otherwise. Id. Even the initial round of thirty-two games over four days does not approach the number of games routinely produced and distributed by the more than twenty regional sports networks.

Finally, the presence of closed captioning may detract from the visual experience. Because of the increasing use of graphics and the uncontrollable nature of the action in sporting events, it is difficult to place captioning in a position which will not obscure game action. For example, if placed at the bottom of the screen for baseball, captioning may detract from the behind the plate camera angle while placement at the top may obscure a leaping catch at the outfield wall. The delay of at least three seconds in live time captioning (Notice at ¶20) also may complicate sports viewing. Although Fox Sports Net does not contend that these kinds of complications alone justify an exemption for all sports programming, it respectfully submits that they should be considered in weighing the benefits of captioning against its substantial cost for regional sports networks.

B. Graphics As An Alternative For Sports Programming

Because of the visual nature of sports and the already widespread use of graphics, commenters observed in the Notice of Inquiry proceeding that there is a far less compelling need for the closed captioning of sporting events:

By its nature television sports coverage gives even the hearing-impaired viewer most of the significant program content. Captioning is not essential to understand the progress of the game -- indeed, the experience would approximate attending the game live -- and conventional scoreboard and background graphics customarily supply much information that is given in the play-by-play.

ABC Comments at 14; see NBC Comments at 14 (“sports event is essentially visual, and statistical information...is often indicated in graphics viewable by the entire audience”); SBCA Comments at 9 (“sporting events...with few exceptions are visually explanatory without the use of other aids”); CBS Comments at 31. Fox Sports Net has included as Exhibit B examples of the graphics typically included in regional sports networks’ production of professional basketball, baseball and hockey games which confirm the wide variety of information visually displayed during televised action.⁹

Although clearly not a perfect substitute for closed captioning, such graphics do convey much of the important information that otherwise would be unavailable to the hearing impaired viewer.¹⁰ Again, the House Report identified the existence of such “alternative means of providing access to the hearing impaired” as a factor to consider in exempting programming from captioning requirements. Thus, NAB suggested that, for sports telecasts, stations “should be allowed to explore the use of other visual elements, such as on-screen ‘bugs’ containing scores and other information, as alternatives to full closed captioning.” NAB Comments at 10. As shown on the annexed Exhibit B, regional sports networks provide a variety of detailed information through on-screen graphics.

⁹ As set forth supra at 8, the production budgets for less popular professional, college, high school, and miscellaneous events are lower such that less extensive graphics are used.

¹⁰ Fox Sports Net recognizes that the “ad libs and banter” between announcers would be unavailable to the hearing impaired viewer. However, these same audio elements are eliminated when electronic news room captioning is used, which the Commission tentatively has concluded to be adequate. Notice at ¶¶21, 121.

Conclusion

Fox Sports Net recognizes the difficult task faced by the Commission in balancing the need for access by the hearing impaired and the cost of such access to all viewers. Because of the unique costs and problems associated with the captioning of regional sporting events, Fox Sports Net respectfully requests that the Commission exempt regional sports networks from mandatory closed captioning and acknowledge the utility of visual graphics for sports programming.

February 28, 1997

Respectfully submitted,

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REGIONAL SPORTS PROGRAMMING SERVICES MANAGED BY FOX SPORTS NET*		
Regional Sports Network	Region**	Subscribers as of December 1996
Fox Sports Arizona	Arizona	740,000
Fox Sports Pittsburgh	Pennsylvania, Ohio, West Virginia	1,700,000
Fox Sports Midwest	Southern Illinois, Indiana, Missouri	1,220,000
Fox Sports Northwest	Alaska, Idaho, Montana, Oregon, Washington	2,410,000
Fox Sports Rocky Mountain	Colorado, Idaho, Kansas, Nebraska, Nevada, New Mexico, Utah, Wyoming	2,310,000
Fox Sports South	Alabama, Georgia, Kentucky, Mississippi, North Carolina, South Carolina	5,230,000
Fox Sports Southwest	Arkansas, Louisiana, New Mexico, Oklahoma, Texas	4,750,000
Fox Sports West	Southern California, Hawaii, Nevada	3,960,000***
Sunshine Network	Florida	3,700,000

* *Fox Sports Net also has non-controlling ownership interests in and does not manage Home Team Sports, SportsChannel Chicago, SportsChannel Pacific, and SportsChannel Philadelphia/PRISM.*

** *The regions may include only a portion of the designated states. Consequently, different portions of the same state may be included in multiple regions.*

*** *Fox Sports West recently has launched a second regional sports network, Fox Sports West II, which has approximately 350,000 subscribers. The subscribers reported above are for Fox Sports West I.*

REGIONAL SPORTS ON-SCREEN GRAPHICS

PROFESSIONAL BASKETBALL

Score

- The score is displayed after most baskets; during and after time-outs; and before and after commercials. The scoreboard also includes the running game clock.

Player Information

- Periodically, when a player enters a game, that player is identified graphically with information that may include a biography, current statistics or a “hero” graphic (e.g. how they are performing in that game, performance in the last game or last five games, etc.). During free-throws, identification information usually is provided.

Fouls

- The player committing a foul typically is identified with information concerning the nature of the foul. Players who foul out of a game are identified.

Coaches

- Coaches generally are identified with their names and records. Additional information, such as past coaching positions and record versus particular opponents, typically is provided.

Additional Game Information

- Throughout the game, various statistical graphics are used to tell the story of the game, as well as the particular team’s standing in the league or division.
 - Game summaries are used during the game to update information, such as turnovers, field goal percentage, free-throw percentage, fouls and any pertinent information at the time of play.
 - Statistics are provided graphically at the end of each quarter (first quarter statistics, halftime statistics, third quarter statistics, and final statistics).

- When there is no scoreboard/clock displayed during play, an individual graphic may be displayed that highlights an important statistic at that point in the game (e.g. turnover comparison, three-point field goal percentage comparison, timeouts left for each team, team fouls, who to foul, etc.).
- Division standings are provided when it is relevant (e.g. two teams from the same division are playing each other for a critical playoff position).
- “Special” graphics are used under certain circumstances (e.g. if a player is at the free-throw line and it is a one-point game and the player has a high or low free-throw percentage).

Other Information

- Arenas are graphically identified with their names and locations.
- Teams as a whole are graphically identified with their records and vital team statistics throughout the game.

PROFESSIONAL HOCKEY

Score

- There is a regularly-displayed on-screen clock and score.

Goals

- When a goal is scored, the score generally will be displayed.
- After a goal is scored, the player who scored the goal generally is identified with information, such as number of career goals, number of goals in that game, time scored, who assisted and whether it was a power play goal.

Penalties

- When a penalty is called, it usually is graphically identified with a shot of who received the penalty and the length of penalty (e.g. two minutes for high-sticking).

Power Play

- During power plays, a power play graphic appears periodically that shows the current score, which team is in the power play, and the running clock counting down the penalty.

Player Information

- Periodically, when a player enters a game, that player is identified graphically with information that may include a biography, current statistics or a “hero” graphic (e.g. how the player is performing in that game, performance in the last game or last five games, performance in the previous meeting with a particular team, etc.).

Coaches

- Coaches generally are identified with their names and records. In addition, various information, such as past coaching positions and record versus particular opponents, typically is provided.

Additional Game Information

- Throughout the game, various statistical graphics are used to tell the story of the game, as well as the particular team’s standing in the league or division.
 - Scoring summaries are used between periods in conjunction with highlights of each goal to capulize each goal scored. The following information is graphically provided in the scoring summary: Time of the goal, who scored it, who assisted (if any), whether or not it was a power play goal.
 - Individual period statistics are summarized graphically at the end of each period (first period statistics, second period statistics, final statistics).
 - When there is no scoreboard/clock displayed during play, an individual graphic may be displayed that highlights an important statistic at that point in the game (e.g. penalty killing, face-offs, power plays, shots on goal, shots on power play, etc.).
 - Division standings are provided when relevant (e.g. two teams from the same division are playing each other for a critical playoff position).
 - “Special” graphics are used for various players under certain circumstances.

Other Information

- Arenas are graphically identified with their names and locations.
- Teams as a whole are graphically identified with their records and vital team statistics throughout the game.

PROFESSIONAL BASEBALL

Score

- There is a regularly-displayed on-screen clock (inning) and score.

Ball and Strike Counts

- During at bats, the pitch count and outs are updated.

Player Information

- Periodically, when a player enters a game, that player is identified graphically with information that may include a biography, current average, updated game statistics, and season statistics.
- An updated box score generally is used after batter changes, updating hits, runs and errors.

Additional Game Information

- Throughout a game, various statistics are shown, including information about division standings, league leaders, playoff standings, etc.